

DEPARTMENT OF THE AIR FORCE

HEADQUARTERS 375TH AIR BASE GROUP (MAC) SCOTT AIR FORCE BASE. ILLINOIS 62225

BELLEVILLE | SCOTT AIR FORCE

8 JUN 1982

EPA Region 5 Records Ctr.

ATTN OF DEEV (Mr. Everett, 2092)

LPC 163 010 15 - St. Clair County - Belleville/Scott Air Force Base IL7570024177 (Your Ltr, 5 Apr 82)

TO Illinois Environmental Protection Agency ATTN: Mr. Kenneth G. Mensing 113 W. Main Street Collinsville, IL 62234

- 1. With regard to your letter of April 5, 1982, subject as above, the following comments are provided:
- a. Scott AFB OPLAN 355-1 and 19-1 both adequately address the contingency actions that have to be taken to handle hazardous waste spills or mishaps. These plans are exercised routinely (at least once a year) and cover the three aspects of hazardous waste handling, namely facility operations, emergency response, and use of emergency equipment. In the future, individual training records will be annotated to reflect the fact that appropriate personnel have participated in the exercise of these plans and the training required.
- b. Our Hazardous Waste Management Plan will be revised to address the aspects of facility closure to include how and when the facility will be partially closed, steps needed to decontaminate facility equipment, and estimate of the maximum inventory of wastes.
- c. All drums which contained holes in their tops have now been replaced with non-leaking drums.
- 2. We appreciate the thoroughness of your inspection and the comments made by you and your staff. We, of course, are very much interested in maintaining a safe, adequate, hazardous waste handling and storage facility.

ROBERT W. SPRICK Deputy Base Civil Engineer

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Environmental Protection Agency

113 W. Main Street Collinsville, IL. 62234

618/345-4606 - Refer to: LPC 163 010 15 - St. Clair County - Belleville/Scott Air Ores Base

April 5, 1982

Scott Air Force Base 375 ABG/DE Scott Air Force Base, Illinois 62269

ATTN: Colonel Robert Arnau

Dear Sir:

On December 4, 1981, a representative of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of Scott Air Force Base near Belleville, Illinois. This inspection was conducted by the Illinois Environmental Protection Agency under a Cooperative Arrangement with, and authorization of, the United States Environmental Protection Agency (USEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) of 1976, P. L. 94-580, as amended. During the inspection the following deficiencies were observed:

Pursuant to 40 CFR 265.16, the owner/operator is required to establish and maintain records relating to the training of personnel involved in hazardous waste management, including a description of the job title for each position at the site, a written job description, a description of training and records detailing the training given to each such individual. The owner/ operator is in violation in that no training records were available.

The owner/operator must have a closure plan at the facility. The plan must include a description of how and when the facility will be partially closed, if applicable, and ultimately closed. The plan must address the steps needed to decontaminate facility equipment. Also required is an estimate of the maximum inventory of wastes in storage or treatment on site at any given time and a schedule for final closure including the anticipated date when wastes will no longer be required. The owner/operator must submit his closure plan to the Regional Administrator at least 180 days before the date he expects to begin closure. These requirements are pursuant to 40 CFR 265.112. Your facility is deficient in that no closure plan was available.

Facilities that store containers of hazardous waste must use nonleaking containers in good condition and containers that are compatible with the wastes in them. The containers must be stored closed and handled so as to not cause ruptures or leaks. Containers must be inspected at least weekly. Containers holding ignitable or reactive waste must be at least 50 feet from the facility property line. These requirements are pursuant to 40 CFR Part 265 Subpart 1. Your facility is deficient in that some of the drums, used for storage, had small holes punched in their tops. If the drums are accidentally tipped over, waste could "escape" through this small hole.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the above deficiencies. Failure to correct these deficiencies may result in enforcement actions initiated by USEPA pursuant to 40 USC 6928. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Tom Powell of my staff at the above number.

Sincerely,

Kenneth G. Mensing, Southern Region Manager Land Field Operations Section Division of Land Pollution Control

TEP: Jir

Enclosure: Inspection Report

cc: Division File / Southern Region USEPA - Region V